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**Attorneys for Plaintiff,
BIG ROCK ASSETS MANAGEMENT, LLC**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BIG ROCK ASSETS MANAGEMENT LLC, a Nevada limited liability company,

CASE NO.: 2:22-cv-1212-APG-NJK

Plaintiff

V.

MTC FINANCIAL INC. DBA TRUSTEE
CORPS., a California Corporation; BANK OF
AMERICA, N.A., a National Association; DOES I-
X; Inclusive

**STIPULATION AND ORDER TO EXTEND
TIME TO RESPOND TO BANK OF
AMERICA, N.A.'S MOTION TO DISMISS
(FIRST REQUEST)**

Defendants.

Big Rock Assets Management, LLC and Bank of America, N.A. stipulate that Plaintiff shall have up to and including **January 13, 2023**, to file its response to Bank of America, N.A.'s Motion to Dismiss Complaint, which is currently due on December 13, 2022.

Good cause exists to grant this extension. Since the first extension was requested, the parties have discussed parameters that involve dismissing this action with prejudice. One party has agreed to the parameters and approval is pending with the other party. Thus, a response to the motion to dismiss may not necessary.

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1 This is the parties' first request for an extension of this deadline and is not intended to cause
2 any delay or prejudice to any party.

3 DATED: December 22, 2022.

5 AKERMAN LLP	6 ANDREW BAO & ASSOCIATES
7 <i>/s/ Scott R. Lachman</i>	8 <i>/s/ Andrew A. Bao</i>
9 MELANIE D. MORGAN, ESQ. 10 Nevada Bar No. 8215 11 SCOTT R. LACHMAN, ESQ. 12 Nevada Bar No. 12016 13 DONNA WITTIG 14 Nevada Bar No. 11015 15 1635 Village Center Circle, Suite 200 16 Las Vegas, NV 89134 17 <i>Attorneys for Bank of America, N.A.</i>	18 ANDREW A. BAO, ESQ. 19 Nevada Bar No. 10508 20 8020 S. Rainbow Boulevard, Suite 100-163 21 Las Vegas, NV 89139 22 <i>Attorneys for Big Rock Assets Management, LLC</i>

13 **IT IS SO ORDERED.**



15 **UNITED STATES DISTRICT JUDGE**
16 Case No.: 2:22-cv-1212-APG-NJK

18 December 26, 2022
19 **DATED:** _____